

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. ANGELA AYALA-MARTINEZ,
a/k/a "La Senora,"
a/k/a "La Vieja,"
a/k/a "Angelita,"
(Counts 1, and 2)
2. MANUEL PEREZ-COLON,
a/k/a "Tito Manuel,"
(Counts 1 and 2)
3. JORGE LUCAS SANTIAGO-RIVERA,
a/k/a "Jay,"
(Counts 1 and 2)
4. RICARDO VELEZ-RAMOS,
a/k/a "Ricky,"
(Count 1)
5. FLORENCIO SANCHEZ DE LEON,
(Counts 1 and 3)
6. YOLANDA RUIZ,
(Counts 1, and 2)
7. JOSE CARRASQUILLO,
a/k/a "Joito,"
(Counts 1,2, and 3)
8. JORGE ALICEA-SERRANO,
a/k/a "Jockey,"
(Counts 1, and 4)
9. ANGEL LUIS MANGUAL-GILBERT,
a/k/a "Cuqui,"
(Count 1)
10. FRANKIE PIETRI-SEPULVEDA,
(Counts 1 and 2)
11. DANIEL SANCHEZ-ORTIZ,
a/k/a "Danny El Gordo,"
(Counts 1 and 2)
12. WANDI AYALA,
(Counts 1 and 2)
13. EDWIN SEVILLA,
(Counts 1 and 2)
14. FELICITA SOTO
a/k/a "Fela,"
(Counts 1 and 2)
15. ANTONIO GONZALEZ-VEGA,
a/k/a "Pollo,"
(Counts 1 and 2)

S U P E R S E D I N G

I N D I C T M E N T

Criminal No. 97 - 082 (SEC)

Six (6) Counts

Violations: Title 21,
U.S.C., Sections 841(a)(1)
and 846; Title 18, U.S.C.,
Sections 1956, 1957, 4 and 2.

CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, P.R.

RECEIVED & FILED
97 DEC 17 PM 6:42

RECD.	TO JUDGE
1/14	
BY	#
ud	444

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.

Page 2

16. MARIA BARBOSA-RODRIGUEZ,
(Counts 1, and 2)
17. CARLOS MANGUAL-SANTIAGO,
(Counts 1 and 2)
18. ANDRES GARCIA-TORRES,
a/k/a "Andy,"
(Counts 1 and 2)
19. MANUEL GARCIA-TORRES,
(Counts 1 and 2)
20. EDWIN MELENDEZ-NEGRON,
a/k/a "Danny Gongolo,"
(Counts 1 and 2)
21. RAUL DIAZ,
a/k/a "El Viejo Raulito,"
(Count 1)
22. DOUGLAS DIAZ,
(Count 1)
23. ENRIQUE MALAVE-DIAZ,
a/k/a "Enriquito,"
(Counts 1,2 and 5)
24. LUZ M. DIAZ-LUGO,
(Counts 1,5 and 6)
25. FELIX R. MIRANDA-MUNOZ,
(Counts 1 and 5)
26. ANGEL R. SUAREZ-VARGAS,
(Counts 1 and 5)
27. HECTOR RETAMAR-RUIZ,
(Count 1)
29. ALEXANDER BOSCAN-RODRIGUEZ,
(Count 1 and 2)
30. JULIO GONZALEZ-MARTINEZ,
a/k/a "El Viejo Juli,"
(Counts 1 and 5)
31. MARTIN ARROYO-CRUZ,
(Counts 1 and 2)
32. HECTOR DOMINICCI-GONZALEZ,
(Counts 1 and 2)
34. SANTOS GONZALEZ-BRACERO,
(Counts 1 and 3)
36. ORLANDO ROSA,
a/k/a "Oly,"
(Counts 1 and 2)
37. ROSA MARTINEZ-PLAZA,
(Counts 1 and 2)
38. CARLOS SILVA-GALINDEZ,
(Count 1)
39. MANUEL TORRES-GALINDEZ,
(Counts 1)
40. ALLISON GOTAY-AVILES,

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.
Page 3

41. EDWIN RODRIGUEZ-AVILES,
(Count 1)
42. JOSE HIRAM SANTIAGO-TORRES,
(Counts 1)
43. FNU MADERA ALMODOVAR,
a/k/a/ "Pito,"
(Count 1)
44. HAROLD RIVERA-RODRIGUEZ,
(Count 1)
45. ROBERTO HIPOLITO SOTO-ANADON,
a/k/a/ "Roberto Cotorra,"
(Count 1)
46. REINALDO GARCIA-MEDINA,
a/k/a "Rey,"
(Count 1)
47. SAMUEL RAMIREZ MEDINA,
(Count 1 and 3)
48. JORGE A. VAZQUEZ-RIVERA,
a/k/a/ "El Gordo,"
(Count 1)
49. CARLOS R. GARCIA-MARIN,
a/k/a "Carlos Alf,"
(Count 1)
50. HUMBERTO L. GARCIA-MARIN,
(Count 1)
51. RICARDO GUILBE SANCHEZ,
a/k/a "Richard La Sombra,"
(Count 1)
52. DAVID MUNIZ GALLEG0,
(Count 1)
53. YASMIN LARACUENTE ALAMEDA,
a/k/a "Yayi,"
(Count 1)
54. LUIS COLLAZO VILLODA,
(Count 1)
55. EMANUEL CANDAL ORTIZ,
(Counts 1 and 2)
56. MIGUEL ANGEL LOYOLA-COLON,
a/k/a "Miguel Cryon,"
(Counts 1 and 2)
57. FREDDIE FIGUEROA,
(Count 1)
58. HECTOR M. TORRES-RODRIGUEZ,
a/k/a "Pipo,"
(Count 1)
59. DERI VENTURA GARCIA,
(Count 1)

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.
Page 4

60. ORLANDO GONZALEZ-HERRERA,
(Count 1)
61. JOSE A. MORALES-BARRIERA,
a/k/a/ "Tonito Cotto,"
(Count 1)
62. EDWIN ROBLEDO GARCIA,
a/k/a "Chevin,"
(Count 1)
63. ROBERTO ROBLEDO GARCIA,
(Count 1)
64. MARIA VICTORIA VALENTIN,
(Count 1)
65. RODNEY LOPEZ GONZALEZ,
(Count 1)
66. FRANCISCO LEON SANCHEZ,
(Counts 1 and 2)
67. EDNA MORENO CABAN,
(Counts 1 and 2)
68. VICTOR R. VIVAS-FEBLES,
(Counts 1 and 2)
69. VICTOR VAZQUEZ RIVERA,
(Count 1)
70. JOSE L. ZAYAS-ALVAREZ,
a/k/a "Maton,"
(Count 1)
71. MIGUEL LESPIER,
(Counts 1 and 2)
72. RENE QUILES,
(Counts 1 and 2)
73. PATRICIA INCLE MATOS,
(Counts 1 and 4)
74. HIRAN SEDA SEGARRA,
(Counts 1 and 4)
75. JOHN DOE, a/k/a "Omar,"
[described as a trigueno
male, approx. 22 years old,
black hair, brown eyes,
approx. 5' 5", 155 lbs.,
with a scar on his forearm]
(Count 1)

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.
Page 5

76. JOHN DOE, a/k/a "Jose,"
[described as a dark-skinned
male, approx. 34 years old,
bald, brown eyes, approx.
5' 11", 225 lbs.]
(Count 1)
77. JOHN DOE, a/k/a "Wally,"
[described as a white male,
approx. 22-24 years old,
brown hair, brown eyes,
approx. 5' 7", 160 lbs.]
(Count 1)
78. JOHN DOE, a/k/a "Rene,"
[described as a trigueno
male, approx. 21 years old,
approx. 5' 8", 150 lbs.,
brown hair, green eyes]
(Count 1)
79. MARCOS MARTINEZ MEDINA,
(Count 1)

Defendants.

THE GRAND JURY CHARGES:

COUNT I

From in or about the summer of 1994, and ending on a date unknown,
but no earlier than in or about June of 1997, in the District of Puerto
Rico and within the jurisdiction of this Court,

- | | |
|--|--|
| [1] ANGELA AYALA-MARTINEZ,
a/k/a "La Senora," a/k/a "La
Vieja,
" a/k/a "Angelita,"; | [7] JOSE CARRASQUILLO,
a/k/a "Joito,"; |
| [2] MANUEL PEREZ-COLON,
a/k/a "Tito Manuel,"; | [8] JORGE ALICEA-SERRANO,
a/k/a "Jockey,"; |
| [3] JORGE LUCAS SANTIAGO-RIVERA,
a/k/a "Jay,"; | [9] ANGEL LUIS MANGUAL-GILBERT,
a/k/a "Cuqui,"; |
| [4] RICARDO VELEZ-RAMOS,
a/k/a "Rick,"; | [10] FRANKIE PIETRI-SEPULVEDA; |
| [5] FLORENCIO SANCHEZ DE LEON,; | [11] DANIEL SANCHEZ-ORTIZ,
a/k/a "Danny El Gordo,"; |
| [6] YOLANDA RUIZ; | [12] WANDI AYALA; |
| | [13] EDWIN SEVILLA; |
| | [14] FELICITA SOTO,
a/k/a "Fela," |

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.
Page 6

- [15] ANTONIO GONZALEZ-VEGA,
a/k/a "Pollo,"
- [16] MARIA BARBOSA-RODRIGUEZ,
- [17] CARLOS MANGUAL-SANTIAGO,
- [18] ANDRES GARCIA-TORRES,
a/k/a "Andy,"
- [19] MANUEL GARCIA-TORRES,
- [20] EDWIN MELENDEZ-NEGRON,
a/k/a "Danny Gongolo,"
- [21] RAUL DIAZ,
a/k/a "El Viejo Raulito,"
- [22] DOUGLAS DIAZ,
- [23] ENRIQUE MALAVE-DIAZ,
a/k/a "Enriquito,"
- [24] LUZ M. DIAZ-LUGO,
- [25] FELIX R. MIRANDA-MUNOZ,
- [26] ANGEL R. SUAREZ-VARGAS,
- [27] HECTOR RETAMAR-RUIZ,
- [29] ALEXANDER BOSCAN-RODRIGUEZ,
- [30] JULIO GONZALEZ-MARTINEZ,
a/k/a "El Viejo Juli,"
- [31] MARTIN ARROYO-CRUZ,
- [32] HECTOR DOMINICCI-GONZALEZ,
- [34] SANTOS GONZALEZ-BRACERO,
- [36] ORLANDO ROSA,
a/k/a "Oly,"
- [37] ROSA MARTINEZ-PLAZA,
- [38] CARLOS SILVA-GALINDEZ,
- [39] MANUEL TORRES-GALINDEZ,
- [40] ALLISON GOTAY-AVILES,
- [41] EDWIN RODRIGUEZ-AVILES,
- [42] JOSE HIRAM SANTIAGO-TORRES,
- [43] FNU MADERA ALMODOVAR,
a/k/a/ "Pito,"
- [44] HAROLD RIVERA-RODRIGUEZ,
- [45] ROBERTO HIPOLITO SOTO-
ANADON,
a/k/a/ "Roberto Cotorra,"
- [46] REINALDO GARCIA-MEDINA,
a/k/a "Rey,"
- [47] SAMUEL RAMIREZ MEDINA,
- [48] JORGE A. VAZQUEZ-RIVERA,
a/k/a/ "El Gordo,"
- [49] CARLOS R. GARCIA-MARIN,
a/k/a "Carlos Alf,"
- [50] HUMBERTO L. GARCIA-MARIN,
- [51] RICARDO GUILBE SANCHEZ,
a/k/a "Richard La Sombra,"
- [52] DAVID MUNIZ GALLEGO,
- [53] YASMIN LARACUENTE ALAMEDA,
a/k/a "Yayi,"
- [54] LUIS COLLAZO VILLODA,
- [55] EMANUEL CANDAL ORTIZ,
- [56] MIGUEL ANGEL LOYOLA-COLON,
a/k/a "Miguel Cryon,"
- [57] FREDDIE FIGUEROA,
- [58] HECTOR M. TORRES-RODRIGUEZ,
a/k/a "Pipo,"
- [59] DERI VENTURA GARCIA,
- [60] ORLANDO GONZALEZ-HERRERA,
- [61] JOSE A. MORALES-BARRIERA,
a/k/a/ "Tonito Cotto,"
- [62] EDWIN ROBLEDO GARCIA,
a/k/a "Chevin,"
- [63] ROBERTO ROBLEDO GARCIA,
- [64] MARIA VICTORIA VALENTIN,
- [65] RODNEY LOPEZ GONZALEZ,
- [66] FRANCISCO LEON,
- [67] EDNA MORENO CABAN,
- [68] VICTOR R. VIVAS-FEBLES,
- [69] VICTOR VAZQUEZ RIVERA,
- [70] JOSE L. ZAYAS-ALVAREZ,
a/k/a "Maton,"
- [71] MIGUEL LESPIER,
- [72] RENE QUILES,
- [73] PATRICIA INCLE MATOS,
- [74] HIRAN SEDA SEGARRA,
- [75] JOHN DOE, a/k/a "Omar,"
[described as a trigueno
male, approx. 22 years old,
black hair, brown eyes,
approx. 5' 5", 155 lbs.,
with a scar on his forearm]
- [76] JOHN DOE, a/k/a "Jose,"
[described as a dark-skinned
male, approx. 34 years old,
bald, brown eyes, approx.
5' 11", 225 lbs.]
- [77] JOHN DOE, a/k/a "Wally,"
[described as a white male,
approx. 22-24 years old,
brown hair, brown eyes,
approx. 5' 7", 160 lbs.]
- [78] JOHN DOE, a/k/a "Rene,"
[described as a trigueno
male, approx. 21 years old,
approx. 5' 8", 150 lbs.,
brown hair, green eyes]
- [79] MARCOS MARTINEZ MEDINA,

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.

Page 7

the defendants herein, did knowingly, willfully, unlawfully, and intentionally combine, conspire, confederate and agree with each other and with divers other persons to the grand jury known and unknown, to commit offenses against the United States, to wit, to knowingly and intentionally possess with the intent to distribute and distribution of multi-kilogram amounts of: (a) cocaine, a Schedule II narcotic drug controlled substance; (b) heroin, a Schedule I narcotic drug controlled substance; and (c) marijuana, a Schedule I controlled substance, that is conspiracy to violate Title 21, United States Code, Section 841(a)(1).

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the co-conspirators committed, among others, the following overt acts, in the District of Puerto Rico or elsewhere and within the jurisdiction of this Court.

I. NARCOTICS SHIPMENTS IMPORTED INTO PUERTO RICO

1. On several occasions during the period of the conspiracy charged in Count One, [8] JORGE ALICEA-SERRANO, a/k/a "Jockey," with the assistance of others, supplied [1] ANGELA AYALA MARTINEZ, a/k/a "La Senora," a/k/a "La Vieja," a/k/a "Angelita," with large multi-hundred kilogram shipments of cocaine.

2. In or about mid-1994, on several occasions, [73] PATRICIA INCLE-MATOS and her husband, [74] HIRAN SEDA-SEGARRA, delivered multi-kilogram quantities of cocaine to associates of [8] JORGE ALICEA-SERRANO,

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.

Page 8

a/k/a "Jockey," which were part of cocaine shipments imported into Puerto Rico.

3. In or about July of 1994, [38] CARLOS SILVA-GALINDEZ recruited a person referred to herein as unindicted co-conspirator #1 (UCC #1) to assist in the retrieval of a shipment of cocaine that was to be airdropped into Puerto Rico.

4. On or about July 11, 1994, [38] CARLOS SILVA-GALINDEZ, [39] MANUEL TORRES-GALINDEZ, [40] ALLISON GOTAY-AVILES, [41] EDWIN RODRIGUEZ-AVILES, [70] JOSE LUIS ZAYAS ALVAREZ, a/k/a "Maton," [42] JOSE HIRAM SANTIAGO-TORRES, [44] HAROLD RIVERA-RODRIGUEZ, UCC #1, and others went to the beach located at La Esperanza to await the airdropped cocaine.

5. On or about July, 11, 1994, the persons described in paragraph 4, above, fled the beach area of La Esperanza when they discovered that the airplane bringing the cocaine was being followed by a law enforcement aircraft and the airplane bringing the cocaine dropped approximately nine (9) bales of cocaine, which were ultimately recovered by law enforcement.

6. In or about August or September of 1994, [42] JOSE HIRAM SANTIAGO-TORRES recruited UCC # 1 to participate in a planned shipment of marijuana which was to be smuggled into Puerto Rico.

7. In or about August or September of 1994, [42] JOSE HIRAM SANTIAGO-TORRES, [40] ALLISON GOTAY-AVILES, [70] JOSE LUIS ZAYAS ALVAREZ, a/k/a "Maton," [43] FNU MADERA-ALMODOVAR, a/k/a "Pito," [44] HAROLD RIVERA-RODRIGUEZ, UCC # 1, and others traveled during evening hours to a beach area on Puerto Rico's southern coast to await the arrival of the marijuana shipment.

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.

Page 9

8. On the evening described in paragraph 7, above, [42] JOSE HIRAM SANTIAGO-TORRES telephoned [45] ROBERTO HIPOLITO SOTO-ANADON, a/k/a "Roberto Cotorra," and told him to tell "Angela" that the marijuana shipment had not arrived.

9. In or about late 1994 or early 1995, [1] ANGELA AYALA-MARTINEZ, a/k/a "La Senora," a/k/a "La Vieja," a/k/a "Angelita," with the assistance of [6] YOLANDA RUIZ; [32] HECTOR DOMINICI-GONZALEZ; [46] REINALDO GARCIA-MEDINA and others, retrieved approximately thirty (30) bales of cocaine, which were later stored at the residence of [32] HECTOR DOMINICCI-GONZALEZ.

10. In or about late 1994 or early 1995, the thirty (30) bales of cocaine described in paragraph, 9, above, were distributed at various times to [3] JORGE LUCAS SANTIAGO-RIVERA, a/k/a "Jay," and other persons.

11. In or about late March of 1995, [1] ANGELA AYALA-MARTINEZ and others delivered multi-kilogram quantities of cocaine to associates of [8] JORGE ALICEA-SERRANO, a/k/a "Jockey," and on or about March 30, 1995, associates of [8] ALICEA-SERRANO stored sixty-six (66) of those kilograms of cocaine in an apartment in Isla Verde, Puerto Rico.

12. In or about early October of 1995, [1] ANGELA AYALA-MARTINEZ organized the retrieval of more than thirty (30) bales of cocaine, with the assistance of [2] MANUEL PEREZ-COLON, a/k/a "Tito Manuel," [16] MARIA BARBOSA-RODRIGUEZ; [32] HECTOR DOMINICCI-GONZALEZ; [46] REINALDO GARCIA-MEDINA, a/k/a "Rey," and others.

13. On or about October 14, 1995, [3] JORGE SANTIAGO-RIVERA, a/k/a "Jay," and Jorge Figueroa-Ruiz (deceased) possessed six (6) kilograms of cocaine, belonging to [1] ANGELA AYALA-MARTINEZ (which were part of the cocaine shipment described in paragraph 12, above).

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.

Page 10

14. In or about between March and May of 1996, [29] ALEXANDER BOSCAN-RODRIGUEZ delivered a van containing over thirty (30) bales of cocaine to the residence of [32] HECTOR DOMINICCI-GONZALEZ for safekeeping.

15. In or about between March and May of 1996, [46] REINALDO GARCIA-MEDINA, a/k/a "Rey," retrieved the majority of the cocaine described in paragraph 14, above, and multi-kilogram quantities of the cocaine shipment were also delivered on several occasions to [7] JOSE CARRASQUILLO, a/k/a "Joito," at the Rosaly Public Housing Project.

II. DRUG TRAFFICKING NEGOTIATIONS AND TRANSACTIONS

16. On or about August 23, 1996, [1] ANGELA AYALA-MARTINEZ, with the assistance of [16] MARIA BARBOSA-MARTINEZ, sold approximately one hundred, sixty (160) grams (gross weight) of cocaine to two confidential informants (CI #2 and CI#3), both acting in an undercover capacity.

17. On or about September 25, 1996, [7] JOSE CARRASQUILLO, a/k/a "Joito," [10] FRANKIE PIETRI-SEPULVEDA, CI #1 and an undercover DEA agent met at a Church's Fried Chicken restaurant in Ponce and negotiated a multi-kilogram cocaine transaction.

18. From in or about September of 1996 to in or about January of 1997, [4] RICARDO VELEZ-RAMOS, a/k/a "Ricky," and [9] ANGEL LUIS MANGUAL-GILBERT, a/k/a "Cuqui Mangual," acting on behalf of [1] ANGELA AYALA-MARTINEZ, met and spoke with CI #1, who was acting in an undercover capacity, to negotiate a drug transaction involving approximately two hundred (200) kilograms of cocaine.

19. On or about December 13, 1996, [1] ANGELA AYALA-MARTINEZ, with the assistance of [16] MARIA BARBOSA-MARTINEZ, sold approximately one

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.

Page 11

hundred, fifty-eight (158) grams (gross weight) of cocaine to two confidential informants (CI #2 and CI#3), both acting in an undercover capacity.

20. On or about January 9, 1997, [21] RAUL DIAZ, a/k/a "El Viejo Raulito," [22] DOUGLAS DIAZ, [9] ANGEL LUIS MANGUAL-GILBERT, a/k/a "Cuqui Mangual," [4] RICARDO VELEZ-RAMOS, a/k/a "Ricky," CI #1, and an undercover DEA agent met at a Church's Chicken restaurant in Ponce to negotiate a cocaine transaction.

21. On or about February 20, 1997, [2] MANUEL PEREZ-COLON, a/k/a "Tito Manuel," at his residence located at Barrio Jacaguas, #B25, Carr. 580, Ext. Luis Llorens Torres, Juana Diaz, Puerto Rico, distributed approximately one hundred, twenty-eight (128) grams of cocaine to [27] HECTOR RETAMAR-RUIZ.

III. NARCOTICS POSSESSION BY CO-CONSPIRATORS

22. On or about October 6, 1994, [11] DANIEL SANCHEZ-ORTIZ, a/k/a "Danny El Gordo," possessed numerous "decks" of cocaine, heroin, a rifle, and approximately \$6,428, in his residence located in his apartment located in Residencial Tibes, Ponce, Puerto Rico.

23. On or about April 16, 1996, [23] ENRIQUE MALAVE-DIAZ, a/k/a "Enriquito," [24] LUZ M. DIAZ-LUGO, [25] FELIX R. MIRANDA-MUNOZ, [26] ANGEL R. SUAREZ-VARGAS, and [30] JULIO GONZALEZ-MARTINEZ, a/k/a "El Viejo Juli," possessed approximately seventy-eight (78) grams (net weight) of heroin and approximately thirty-two (32) grams (net weight) of cocaine.

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.
Page 12

24. On or about January 26, 1996, [10] FRANKIE PIETRI-SEPULVEDA possessed in excess of one (1) kilogram of cocaine and approximately \$14,231.

25. On or about August 29, 1996, [11] DANIEL SANCHEZ-ORTIZ, a/k/a "Danny El Gordo," possessed approximately 225 decks of cocaine and a Smith & Wesson .357 caliber revolver with a laser sight in his residence located at Urb. Punto Oro, Street 1, #XX-35, Ponce, Puerto Rico.

IV. DRUG POINT ACTIVITY

26. In or about the period of the conspiracy charged in Count One of the instant indictment, [1] ANGELA AYALA-MARTINEZ, a/k/a "La Senora," a/k/a "La Vieja," a/k/a "Angelita," and her organization controlled and/or supplied illegal narcotics to numerous drug points ("puntos") in the Ponce area, some of which are described below.

CEIBA DRUG TRAFFICKING AND RELATED
ACTIVITIES FROM IN AND ABOUT 1994 TO 1996

27. During in or about 1994, 1995 and 1996, [45] ROBERTO HIPOLITO SOTO-ANADON, a/k/a "Roberto Cotorra," ran the drug distribution point at the Ceiba Public Housing Project (Ceiba), in Ponce, Puerto Rico.

28. During the period described in paragraph 27, above, [48] JORGE A. VAZQUEZ-RIVERA, a/k/a "El Gordo," supplied the drug distribution points at Ceiba and, at varying times between 1994 and 1996, delivered, directly or indirectly, illegal narcotics to persons, including, but not limited to, [49] CARLOS R. GARCIA-MARIN, a/k/a "Carlos Alf," [50] HUMBERTO GARCIA-MARIN, [51] RICHARD L. GUILBE-SANCHEZ, a/k/a "Richard La Sombra," [52]

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.
Page 13

DAVID MUNIZ GALLEG0, and [42] JOSE HIRAM SANTIAGO-TORRES, who would prepare and package ("deck") the drugs and deliver them to sellers ("tiradores") at the drug point(s).

29. At different times, during in and about 1994 to 1996, on a regular basis [40] ALLISON GOTAY-AVILES, carried firearms in his role as an enforcer ("gatillero") with respect to the operations of the Ceiba drug point.

30. In or about November of 1995, [40] ALLISON GOTAY-AVILES, instructed UCC #2 to kill Wilfredo Cruz-Hernandez, a/k/a "El Domi," in connection with the operations of a drug point in Ceiba.

31. On or about November 6, 1995, at the Ceiba Public Housing Project, [51] RICHARD L. GUILBE-SANCHES, a/k/a "Richard La Sombra," and UCC #2, both using handguns, shot and killed Wilfredo Cruz-Hernandez, a/k/a "El Domi."

32. In or about 1996, [53] YAZMIN LARACUENTE ALAMEDA, a/k/a "Yayi," and [54] LUIS COLLAZO VILLODA, ran the heroin distribution point in the Ceiba Public Housing Project.

SANTIAGO IGLESIAS DRUG TRAFFICKING AND
RELATED ACTIVITIES FROM IN AND ABOUT 1994 TO 1997

33. In or about 1994 and 1995, [1] ANGELA AYALA-MARTINEZ would supply the cocaine for sale at the drug point at the Santiago Iglesias Public Housing Project and, on various occasions, [1] AYALA-MARTINEZ, [2] MANUEL PEREZ-COLON, a/k/a "Tito Manuel," [3] JORGE LUCAS SANTIAGO-RIVERA, a/k/a "Jay," and/or [6] YOLANDA RUIZ would deliver the cocaine to [15] ANTONIO GONZALEZ-VEGA, a/k/a "Pollo," and others.

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.

Page 14

34. In or about 1994 and 1995, [15] ANTONIO GONZALEZ-VEGA, a/k/a "Pollo," ran the drug point at Santiago Iglesias and would deliver the illegal narcotics sold at the drug point to [55] EMANUEL CANDAL ORTIZ and/or [56] MIGUEL ANGEL LOYOLA-CANCEL, a/k/a "Miguel Cryon," who would prepare (or "deck") the narcotics for retail sale at the drug point.

35. In or about July of 1995, and after the incarceration of [15] ANTONIO GONZALEZ-VEGA, a/k/a "Pollo," [55] EMANUEL CANDAL ORTIZ and [56] MIGUEL ANGEL LOYOLA-CANCEL, a/k/a "Miguel Cryon," ran the drug point at Santiago Iglesias.

RESIDENCIAL TIBES DRUG TRAFFICKING AND
RELATED ACTIVITIES DURING IN AND ABOUT 1996

36. In or about early 1996, [29] ALEXANDER BOSCANA-RODRIGUEZ and [76] JOHN DOE, a/k/a "Jose," jointly ran the drug point for [1] AYALA-MARTINEZ at *Residencial Tibes*, where they distributed illegal narcotics, including heroin and cocaine.

37. In or about 1996, AYALA-MARTINEZ fired [29] BOSCANA from his position as "runner" of the drug point at *Residencial Tibes*, and [76] JOHN DOE, a/k/a "Jose," continued running the drug point.

38. In or about March of 1996, [1] ANGELA AYALA-MARTINEZ instructed Juan Pablo Diaz Morales, a/k/a "Pablin," (not charged herein) to kill Doel Velazquez-Rivera, a/k/a "El Viejo Doel," because, among other things, he (Velazquez-Rivera) had fired a weapon ("tiroteado") inside *Res. Tibes*.

39. On or about March 24, 1996, Juan Pablo Diaz Morales, a/k/a "Pablin," (not charged herein) and [57] FREDDIE FIGUEROA, shot and killed Doel Velazquez-Rivera, a/k/a "El Viejo Doel," with Demetrio Ramirez Perez also being killed during the resulting shoot-out.

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.
Page 15

40. On or about July 14, 1996, a person known as "Eliezer" (deceased) acting upon orders given by [1] ANGELA AYALA-MARTINEZ killed JOSE A. CASTILLO-APONTE, a/k/a "Joito El Orejon."

LA CANTERA PUBLIC HOUSING PROJECT DRUG TRAFFICKING AND
RELATED ACTIVITIES DURING IN AND ABOUT 1996 AND EARLY 1997

41. In or about 1996, [1] ANGELA AYALA MARTINEZ, a/k/a "La Senora," a/k/a "La Vieja," a/k/a "Angelita," controlled the drug point located at La Cantera Public Housing Project (La Cantera) located in Ponce, Puerto Rico.

42. In or about 1996, [19] MANUEL GARCIA-TORRES, after replacing his brother -- Tommy Garcia Torres (deceased), ran the drug point for [1] AYALA-MARTINEZ at La Cantera, where illegal narcotics, including heroin and cocaine, were distributed.

43. In or about 1996, [20] EDWIN MELENDEZ-NEGRON, a/k/a "Danny Gongolo," and [58] HECTOR M. TORRES RODRIGUEZ, a/k/a "Pipo," (with the assistance of [69] VICTOR VAZQUEZ-RIVERA) supplied narcotics to [19] MANUEL GARCIA-TORRES for sale at La Cantera's drug distribution point.

44. In or about 1996, [19] MANUEL GARCIA-TORRES, [18] ANDY GARCIA-TORRES, [59] DERI VENTURA GARCIA, [75] JOHN DOE, a/k/a "Omar," an unindicated co-conspirator (hereinafter UCC #2) and others would prepare (or "deck") the illegal narcotics for sale at the La Cantera drug point.

45. In or about early 1996, [19] MANUEL GARCIA-TORRES and [59] DERI VENTURA, delivered to UCC #2 a shotgun, numerous magazines and rounds of ammunition, handcuffs, a bullet proof vest, and other items, which had been

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.

Page 16

stored in an apartment used to package illegal narcotics for UCC #2 to store and hide at UCC #2's residence.

46. In or about early 1996, [19] MANUEL GARCIA-TORRES delivered approximately two (2) kilograms of cocaine to UCC #2 to store and hide at UCC #2's residence, until the cocaine was needed for distribution at the La Cantera drug point.

47. In or about early 1996, [18] ANDY GARCIA-TORRES delivered an Uzi-style firearm to UCC #2 to store and hide at the UCC #2's residence.

48. In or about 1996, [19] MANUEL GARCIA-TORRES and others delivered kilograms of cocaine to the UCC on a regular basis for UCC #2 to store at UCC #2's residence.

49. In or about 1996, [78] JOHN DOE, a/k/a "Rene," would store heroin on a regular basis on behalf of [19] MANUEL GARCIA-TORRES.

50. In or about 1996, [1] AYALA-MARTINEZ paid [18] ANDY GARCIA-TORRES, [59] DERI VENTURA GARCIA, [57] FREDDY FIGUEROA, and [77] JOHN DOE, a/k/a "Wally," each fifteen thousand dollars (\$15,000) for their assistance in retrieving a large shipment of cocaine.

51. In or about December of 1996, [1] ANGELA AYALA-MARTINEZ asked CI #2 if CI#2 could find out where Manuel and Eddie Vazquez were living "*para llevarle la paranda*" ("to take the party to them").

52. On or about February 14, 1997, [18] ANDRES GARCIA-TORRES, a/k/a "Andy," and [79] MARCOS MARTINEZ-MEDINA, with the assistance of [19] MANUEL GARCIA-TORRES, shot and killed Jose A. Negrón-Santiago and Romarie Santiago-Rodriguez. ✓

53. On or about February 18, 1997, [19] MANUEL GARCIA-TORRES, [20] EDWIN MELENDEZ-NEGRON, a/k/a "Danny Gongolo," [59] DERI VENTURA GARCIA,

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.

Page 17

[75] JOHN DOE, a/k/a "Omar," [77] JOHN DOE, a/k/a "Wally," aided and abetted by others, shot and killed Michael Vazquez (who was believed to have been involved in the killing of Tommy Garcia-Torres).

54. On or about February 18, 1997, [18] ANDY GARCIA-TORRES and JAIME GARCIA-TORRES (not charged herein), shot and killed Eddie Vazquez (Michael Vazquez' father).

55. On or about February 19, 1997, [19] MANUEL GARCIA-TORRES requested that [60] ORLANDO GONZALEZ HERRERA, (the owner of a auto-repair shop), lie to the police as to the length of time a vehicle used in the murders of Michael and Eddie Vazquez had been in his shop and [60] ORLANDO GONZALEZ HERRERA complied.

56. On or about, February 19, 1997, [16] MARIA BARBOSA-RODRIGUEZ met with CI # 2 to discuss the purchase of illegal narcotics from [1] ANGELA AYALA-MARTINEZ. [16] MARIA BARBOSA indicated that [1] AYALA-MARTINEZ, was not available because she and [19] MANUEL GARCIA-TORRES, [20] EDWIN MELENDEZ-NEGRON, a/k/a "Danny Gongolo," and [59] DERI VENTURA GARCIA, had been celebrating the killings of Michael and Eddie Vazquez.

BETANCES 21 DRUG TRAFFICKING
ACTIVITIES IN AND ABOUT 1996

57. In or about 1996, [61] JOSE A. MORALES BARRIERA, a/k/a "Tonito Cotto," ran a drug point at Calle Betances 21, in Ponce, Puerto Rico, and [61] MORALES BARRIERA would receive narcotics from, and deliver narcotics to, UCC # 2.

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.
Page 18

REAL ANON DRUG TRAFFICKING
ACTIVITIES IN AND ABOUT 1996

58. In or about 1996, [62] EDWIN ROBLEDO-GARCIA, a/k/a "Chevin," and [63] ROBERTO ROBLEDO-GARCIA supplied illegal narcotics to [64] MARIA VICTORIA VALENTIN-PLATA and her husband [65] RODNEY LOPEZ-GONZALEZ, who would distribute the narcotics at a drug point located at the Real Anon Public Housing Project, in Ponce, Puerto Rico.

LOS LIRIOS DRUG TRAFFICKING
ACTIVITIES IN AND ABOUT 1997

59. From on or about February 7, 1997, and to on or about May 5, 1997, [11] DANIEL SANCHEZ-ORTIZ, "Danny El Gordo," ran a drug distribution point at *Los Lirios*, which he rented from [2] MANUEL PEREZ-COLON a/k/a "Tito Manuel."

V. MONEY LAUNDERING AND RELATED ACTIVITIES

DELIVERY OF DRUG PROCEEDS
TO [1] ANGELA AYALA-MARTINEZ

60. At different times during the period of the conspiracy charged in Count One of the indictment, drug trafficking proceeds generated from the sale of narcotics at various drug points controlled by [1] ANGELA AYALA-MARTINEZ were delivered to her by, [2] "Tito Manuel" [3] JORGE LUCAS SANTIAGO-RIVERA, a/k/a "Jay," [7] JOSE CARRASQUILLO, a/k/a "Joito," [10] FRANKIE PIETRI-SEPULVEDA, [11] DANIEL SANCHEZ-ORTIZ, a/k/a "Danny El Gordo," [15] ANTONIO GONZALEZ-VEGA, a/k/a "Pollo," [17] CARLOS MANGUAL-SANTIAGO, [18] ANDRES GARCIA-TORRES, a/k/a "Andy," [19] MANUEL GARCIA-TORRES, [20] EDWIN MELENDEZ-NEGRON, a/k/a "Danny Gongolo," [23] ENRIQUE

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.
Page 19

MALAVE-DIAZ, a/k/a "Enriquito," [29] ALEXANDER BOSCAN-RODRIGUEZ, [36] ORLANDO ROSA, a/k/a "Oly," [37] ROSA MARTINEZ-PLAZA, and others.

HIDING AND STORING DRUG PROCEEDS

61. At different times during the period charged in Count One of the Indictment, [6] YOLANDA RUIZ, [12] WANDI AYALA, [13] EDWIN SEVILLA, [14] FELICITA SOTO, [16] MARIA BARBOSA-RODRIGUEZ and others, received, stored and concealed drug trafficking proceeds on behalf of [1] ANGELA AYALA-MARTINEZ.

62. On or about August 26, 1996, [13] EDWIN SEVILLA and [14] FELICITA SOTO possessed seven thousand, one hundred, twenty-eight dollars (\$7,128), mostly in bills of denominations of \$20 or less.

63. On or about May 5, 1997, [1] ANGELA AYALA-MARTINEZ possessed approximately \$4,400; [19] MANUEL GARCIA-TORRES possessed \$5,060; [2] MANUEL PEREZ-COLON, a/k/a "Tito Manuel," possessed \$6,500; and [11] DANIEL SANCHEZ-ORTIZ, a/k/a "Danny El Gordo," possessed \$7,160.

64. In or about October of 1995 (and after the October 14, 1995, arrest of [3] JORGE SANTIAGO-RIVERA, a/k/a "Jay"), [66] ATTORNEY FRANCISCO LEON SANCHEZ and [67] EDNA MORENO-CABAN retrieved approximately fifty-five thousand dollars (\$55,000), which were drug proceeds belonging to [3] JORGE SANTIAGO-RIVERA, a/k/a "Jay," that were buried under his residence, and [67] MORENO-CABAN gave the money to [66] ATTORNEY LEON SANCHEZ.

65. In or about July of 1996, [66] ATTORNEY FRANCISCO LEON SANCHEZ delivered approximately forty-six thousand, four hundred dollars (\$46,400) (comprised mostly of small denomination bills -- \$1.00, \$5.00, \$10.00 and \$20.00) to representatives of Ponce Bank, in partial payment for the

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.
Page 20

purchase of the real property located at Mayor Cantera Street, #193, Ponce, Puerto Rico.

66. In or about July of 1996, [66] ATTORNEY FRANCISCO LEON SANCHEZ had the Mayor Cantera Street property placed in his and his wife's names, in order to disguise and conceal the fact that the true owner of the property was [1] ANGELA AYALA-MARTINEZ.

67. During various times during the conspiracy charged in Count One of the indictment, [1] ANGELA AYALA-MARTINEZ had property belonging to her registered in the names of [31] MARTIN ARROYO-CRUZ, [32] HECTOR DOMINICCI-GONZALEZ, and others, in order to conceal her ownership of such property.

68. On various occasions from in and about late 1996, up to and including in and about mid-1997, [68] VICTOR VIVAS FEBLES received and kept vehicles (including two red BMWs and a Nissan 300ZX) at his residence belonging to [1] ANGELA AYALA-MARTINEZ and other organization members in order to avoid their detection by law enforcement officials.

69. In or about the spring of 1997, [55] EMANUEL CANDAL ORTIZ delivered approximately eighteen thousand dollars (\$18,000) to [68] VICTOR VIVAS FEBLES for the purchase of a red BMW.,

70. On or about June 9, 1997, [55] EMANUEL CANDAL ORTIZ possessed a 1995 green Ford Explorer and a 1992 Mazda 929, both belonging to [1] ANGELA AYALA-MARTINEZ, in order to conceal them from law enforcement officers and the 1995 green Ford Explorer was hidden by [71] MIGUEL LESPIER.

71. On or about June 9, 1997, Jose Casals (not charged herein) possessed a 1990 green Ford Bronco and a 1993 Mazda 929, both belonging to

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.
Page 21

[1] ANGELA AYALA-MARTINEZ, which had been delivered to him by [55] EMANUEL CANDAL ORTIZ.

72. On or about June 10, 1997, [55] EMANUEL CANDAL ORTIZ possessed one of two jet skis belonging to [1] ANGELA AYALA-MARTINEZ, which had been registered in the name of [72] RENE QUILES in order to conceal the true ownership of the jet skis.

73. Counts Two through Five, inclusive, of the instant indictment are realleged and incorporated herein by reference and are further designated as overt acts in furtherance of the conspiracy.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

From in or about the summer of 1994, and ending on a date unknown, but no earlier than in or about June of 1997, in the District of Puerto Rico and elsewhere and within the jurisdiction of this Court,

[1] ANGELA AYALA-MARTINEZ a/k/a "La Senora," a/k/a "La Vieja," a/k/a "Angelita,"	[18] ANDRES GARCIA-TORRES, a/k/a "Andy,"
[2] MANUEL PEREZ-COLON a/k/a "Tito Manuel"	[19] MANUEL GARCIA-TORRES,
[3] JORGE LUCAS SANTIAGO-RIVERA a/k/a "Jay,"	[20] EDWIN MELENDEZ-NEGRON, a/k/a "Danny Gongolo,"
[6] YOLANDA RUIZ,	[23] ENRIQUE MALAVE-DIAZ, a/k/a "Enriquito,"
[7] JOSE CARRASQUILLO, a/k/a "Joito,"	[29] ALEXANDER BOSCAN-RODRIGUEZ,
[10] FRANKIE PIETRI-SEPULVEDA,	[31] MARTIN ARROYO CRUZ,
[11] DANIEL SANCHEZ-ORTIZ, a/k/a "Danny El Gordo,"	[32] HECTOR DOMINICCI-GONZALEZ,
[12] WANDI AYALA,	[36] ORLANDO ROSA, a/k/a "Oly,"
[13] EDWIN SEVILLA,	[37] ROSA MARTINEZ-PLAZA,
[14] FELICITA SOTO, a/k/a "Fela,"	[55] EMANUEL CANDAL ORTIZ,
[15] ANTONIO GONZALEZ-VEGA, a/k/a "Pollo,"	[56] MIGUEL ANGEL LOYOLA-COLON, a/k/a "Miguel Cryon,"
[16] MARIA BARBOSA-RODRIGUEZ,	[66] FRANCISCO LEON,
	[67] EDNA MORENO CABAN,
	[68] VICTOR VIVAS-FEBLES,
	[71] MIGUEL LESPIER,
	[72] RENE QUILES,

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.
Page 22

[17] CARLOS MANGUAL-SANTIAGO,

the defendants herein, did unlawfully, knowingly, intentionally, and willfully combine, conspire, confederate and agree together and with each other and with divers persons, both known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Sections 1956 and 1957, including:

A. To knowingly conduct or attempt to conduct financial transactions, knowing that the proceeds involved in the financial transactions represented the proceeds of some form of unlawful activity, when the financial transactions in fact involved the proceeds of specified unlawful activity, to wit: the importation, sale and otherwise dealing in narcotics or other dangerous drugs, as defined in Title 21, United States Code, with the intent to promote the carrying on of specified unlawful activity and knowing that the transactions are designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity, contrary to the provisions of Title 18, United States Code, Section 1956(a)(1);

B. To knowingly engage or attempt to engage in a monetary transaction in criminally derived property that was of a value greater than \$10,000, which property was derived from specified unlawful activity, to wit: the importation, sale and otherwise dealing in narcotics or other dangerous drugs, as defined in Title 21, United States Code, contrary to the provisions of Title 18, United States Code, Section 1957.

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.

Page 23

The Overt Acts listed in Count One of the instant indictment are realleged and incorporated herein by reference as if set forth fully herein and are further designated as Overt Acts in furtherance of the conspiracy charged in Count Two of this indictment.

Counts One, Three, Four and Five, of the instant indictment are realleged and incorporated herein by reference as if set forth fully herein and are further designated as Overt Acts in furtherance of the conspiracy charged in Count Two of the instant indictment.

All in violation of Title 18, United States Code, Section 1956(h).

COUNT THREE

From in or about June of 1996, up to and including in or about July of 1996, in the District of Puerto Rico and within the jurisdiction of this Court,

[5] FLORENCIO SANCHEZ DE LEON,
[7] JOSE CARRASQUILLO, a/k/a "Joito,"
[34] SANTOS GONZALEZ-BRACERO,
[47] SAMUEL J. RAMIREZ-MEDINA,

the defendants herein, did knowingly, willfully, unlawfully, and intentionally combine, conspire, confederate and agree with each other and with divers other persons to the grand jury known and unknown, to commit an offense against the United States, to wit, to knowingly and intentionally possess with the intent to distribute multi-kilogram amounts of cocaine, a Schedule II narcotic drug controlled substance, totaling approximately one hundred (100) kilograms of cocaine, that is, conspiracy to violate Title 21, United States Code, Section 841(a)(1). All in violation of Title 21, United States Code, Section 846.

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.

Page 24

COUNT FOUR

During in or about mid-1994, the exact dates being unknown, in the District of Puerto Rico and within the jurisdiction of this Court,

[8] JORGE ALICEA-SERRANO, a/k/a "Jockey,"
[73] PATRICIA INCLE-MATOS,
[74] HIRAN SEDA SEGARRA,

the defendants herein, did knowingly, willfully, unlawfully, and intentionally combine, conspire, confederate and agree with each other and with divers other persons to the grand jury known and unknown, to commit offenses against the United States, to wit, to knowingly and intentionally possess with the intent to distribute and distribution of multi-kilogram amounts of cocaine, a Schedule II narcotic drug controlled substance, in excess of one hundred (100) kilograms of cocaine, that is, conspiracy to violate Title 21, United States Code, Section 841(a)(1). All in violation of Title 21, United States Code, Section 846.

COUNT FIVE

On or about April 16, 1996, in the District of Puerto Rico and within the jurisdiction of this Court,

[23] ENRIQUE MALAVE-DIAZ,
a/k/a "Enriquito,"
[24] LUZ M. DIAZ-LUGO,
[25] FELIX R. MIRANDA-MUNOZ,
[26] ANGEL R. SUAREZ-VARGAS,
[30] JULIO GONZALEZ-MARTINEZ
a/k/a "El Viejo Juli,"

the defendants herein, while aiding and abetting each other, did possess with the intent to distribute approximately seventy-eight (78) grams (net weight) of heroin, a Schedule I narcotic drug controlled substance, and

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.

Page 25

approximately thirty-two (32) grams (net weight) of cocaine, a Schedule I narcotic drug controlled substance; all in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SIX

On or about April 16, 1996, in the District of Puerto Rico and with in the jurisdiction of this Court,

[24] LUZ M. DIAZ LUGO,

the defendant herein, having knowledge of the actual commission of a felony cognizable by a court of the United States, to wit, the possession with the intent to distribute of cocaine and heroin, Schedule II and I narcotic drug controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), did knowingly, willfully, intentionally, and unlawfully conceal and did not as soon as possible make known the same to some judge

Superseding Indictment

U.S. v. Angela Ayala-Martinez, et al.
Page 26

or other person in civil or military authority under the United States;
all in violation of Title 18, United States Code, Section 4.

GUILLERMO GIL
United States Attorney

Jorge E. Vega Pacheco
Assistant U.S. Attorney
Chief, Criminal Division

Sonia I. Torres
Assistant U.S. Attorney

W. Stephen Muldrow
Assistant U.S. Attorney

Date: December 17, 1997.

TRUE BILL

FOREPERSON